

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ARTHUR SLAVEN, JOHN MCLINDEN and LAURENCE ASHKIN,)	
)	
)	
Plaintiffs,)	Civil Action No.: 1:13-cv-1370
)	
)	Honorable Charles Norgle
vs.)	
)	
GREAT AMERICAN INSURANCE COMPANY,)	
)	
)	
Defendant.)	
)	

**JOINT MOTION FOR ENTRY OF DISCOVERY
PLAN AND SCHEDULING**

On August 28, 2013 the parties to this matter held discussions in accordance with Rule 26(f) and reached agreement with regards to a proposed discovery schedule in this matter. On August 30, 2013 the Court held a status hearing where the parties presented their proposed discovery schedule. The Court requested that the parties submit a proposed scheduling order outlining future deadlines in this matter. [Dkt. No. 25]. Accordingly, the parties respectfully request that the Court enter an order substantially in the form attached as Exhibit A hereto, which incorporates the following deadlines.

The parties have agreed to the following proposed schedule:

1. Initial disclosures required by Federal Rule of Civil Procedure 26(a) shall be exchanged on or before September 20, 2013.
2. The deadline for Plaintiffs to join parties, amend pleadings, and file supplemental pleadings shall be January 24, 2014. A motion for leave to amend is not necessary.

3. The deadline for Defendant to join parties, amend pleadings, and file supplemental pleadings shall be February 14, 2014. A motion for leave to amend is not necessary.

4. The deadline for the completion of fact discovery shall be May 30, 2014.

5. The deadline for Plaintiffs' disclosure of affirmative expert witnesses and testimony pursuant to Fed. R. Civ. P. 26(a)(2) shall be June 13, 2014.

6. The deadline for Defendant's disclosure of affirmative and rebuttal expert witnesses and testimony pursuant to Federal Rule of Civil Procedure 26(a)(2) shall be July 18, 2014.

7. The deadline for Plaintiffs' disclosure of rebuttal expert witnesses and testimony, solely in response to issues and topics raised by Defendant's July 18, 2014 Fed. R. Civ. P. 26(a)(2) disclosure of affirmative expert witnesses and testimony, shall be August 15, 2014.

8. The deadline for the completion of expert discovery, including expert depositions, shall be September 12, 2014.

9. The deadline for filing any dispositive motions shall be November 14, 2014.

WHEREFORE, the parties respectfully request the Court enter an order incorporating the deadlines included above.

Dated: September 13, 2013

Respectfully Submitted,

/s/ Joshua M. Wiersma

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Certificate of Service

I hereby certify that this 13th day of September, 2013, this **JOINT MOTION FOR ENTRY OF DISCOVERY PLAN AND SCHEDULING** was filed through the Electronic Case Filing System of the United States District Court for the Northern District of Illinois and will be served electronically upon all counsel of record.

By: /s/ Joshua M. Wiersma

Counsel for Plaintiff